

De Rosa, Christopher (Chris) (ATSDR/DTEM/OD)

From: De Rosa, Christopher (Chris) (ATSDR/DTEM/OD)
Sent: Tuesday, February 27, 2007 7:22 PM
To: Frumkin, Howard (ATSDR/OA/OD); Sinks, Tom (ATSDR/OA/OD)
Cc: Holler, James S. (Jim) (ATSDR/DTEM/PRMSB); Murray, Ed (ATSDR/DTEM/ATB)
Subject: FW: Draft Letter

Attachments: Patrick Edward Preston.doc

Howie and Tom,

This is the issue that I discussed w/ you Tom this afternoon. The letter captures some of my concerns on this consult which I saw for the first time today. In my discussions w/ staff, regarding why I was not in the loop, I was informed that they were working on this under the directions of your office. I now have a clearer picture of this and have reaffirmed our SOP's that have been in place for many years. I regret this breakdown and have addressed this issue w/ our staff.

I have no intention of pursuing this any further until I have direction from your office.

Chris

Christopher T. De Rosa, M.S., Ph.D.
Director, Division of Toxicology and Environmental Medicine
Agency for Toxic Substances and Disease Registry
1600 Clifton Road - Mailstop F32
Atlanta, GA 30333
(770) 488-7003



Patrick Edward
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A-3-4

February 27, 2007

Patrick Edward Preston, Trial Attorney
Office of Chief Counsel
Federal Emergency Management Agency
US Department of Homeland Security
500 C Street, SW
Washington, DC 20472
(202) 646-4536

Dear Mr. Preston:

It has just come to my attention that the Health Consultation "Formaldehyde Sampling at FEMA Temporary Housing Units" has been completed without a policy review by our senior technical staff. I am concerned that this health consultation is incomplete and perhaps misleading.

Formaldehyde is classified as "reasonably anticipated to be a human carcinogen. As such, there is no recognized "safe level" of exposure. Thus, any level of exposure to formaldehyde may pose a cancer risk, regardless of duration. Failure to communicate this issue is possibly misleading, and a threat to public health. I had discussed this issue several months ago in a review of the public statement derived from Toxicological Profile that FEMA proposed. I specified at that time that this statement contained no mention of the cancer risk and that should be a public health concern.

Thank you for your consideration of this issue and please feel free to contact me. Failure to speak to the long-term cancer risk regarding formaldehyde exposure irrespective of duration is of particular concern.

Christopher T. De Rosa, M.S., Ph.D.
Director, Division of Toxicology and Environmental Medicine
Agency for Toxic Substances and Disease Registry

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Cc: De Rosa, Christopher (Chris) (ATSDR/DTEM/OD)
Subject: Draft Letter to FEMA
Importance: High

Howie and Tom,

I am resending the previous email (below) which describes my concerns regarding the formaldehyde health consultation. If I receive no objections from you, I will send the attached letter to FEMA by C.O.B Friday, March 9.

Chris

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Sent: Tuesday, February 27, 2007 7:22 PM
To: Frumkin, Howard (ATSDR/OA/OD); Sinks, Tom (ATSDR/OA/OD)
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<< File: Patrick Edward Preston.doc >>

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De Rosa, Christopher (Chris) (ATSDR/DTEM/OD)

From: De Rosa, Christopher (Chris) (ATSDR/DTEM/OD)
Sent: Friday, March 09, 2007 1:56 PM
To: Frumkin, Howard (ATSDR/OA/OD); Sinks, Tom (ATSDR/OA/OD)
Subject: RE: Draft Letter to FEMA

The consultation was developed, sent forward, and signed by our DTEM staff. They indicated to me that they had been directed to not share the information further and not to address longer term health effects. That's why IARC was cited repeatedly without reference to cancer and was not included in the literature cited.

FEMA's initial contact came directly to me nine months ago on this issue. I reviewed the proposed statement and specified that they had neglected to address longer term risk including cancer.

FEMA then came back through our COPTER office with the same request and this was then assigned to DTEM staff. After completion of the consultation our staff sent their signed consultation directly to COPTER who sent out the letter.

By separate email I have shared this proposed response with Mark Keim. If you wish for him to send it out that's fine. Otherwise I will send it out at your direction. Either way is fine with me.

Christopher T. De Rosa, M.S., Ph.D.
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 1600 Clifton Road - Mailstop F32
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From: Frumkin, Howard (ATSDR/OA/OD)
Sent: Friday, March 09, 2007 1:23 PM
To: De Rosa, Christopher (Chris) (ATSDR/DTEM/OD); Sinks, Tom (ATSDR/OA/OD)
Subject: RE: Draft Letter to FEMA

OK, I've read your letter Chris. I agree with your concern and I agree that we need to amend our Health Consultation with information on cancer risk. However, I don't think a separate letter from a different location in our agency than originated the initial consultation is the right way to go. It would be better to have the author of the health assessment send an amendment, so we speak with a single voice. Did this come out of Bill Cibulas's shop?

Howard Frumkin, M.D., Dr.P.H., Director
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 Agency for Toxic Substances and Disease Registry
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From: De Rosa, Christopher (Chris) (ATSDR/DTEM/OD)
Sent: Thursday, March 08, 2007 9:34 AM
To: Frumkin, Howard (ATSDR/OA/OD); Sinks, Tom (ATSDR/OA/OD)

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